

Víctor Ubierna de las Heras,
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UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

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In re: : Chapter 11
: :
Celsius Network LLC, *et al.*¹, : Case No. 22-10964
: :
Debtors. : (Jointly Administered)
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**VÍCTOR UBIERNA DE LAS HERAS JOINDER TO OBJECTION TO THE
DEBTORS' MOTION TO SELL STABLECOIN FILED BY THE UNITED
STATES TRUSTEE AND THE STATES OF TEXAS, VERMONT AND
WISCONSIN.**

Víctor Ubierna de las Heras, pro se creditor, hereby joins in the objections filed by the United States Trustee (Docket No. 933), states of Texas (Docket 922), Vermont (Docket No. 925) and Wisconsin (Docket No. 967) to the Debtors' Motion Seeking Entry of an Order (I) Permitting the Sale of Stablecoin in the Ordinary Course and (II) Granting Related Relief. (Docket. 832.)² Further, Víctor Ubierna de las Heras

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are: Celsius Network LLC (2148); Celsius KeyFi LLC (4414); Celsius Lending LLC (8417); Celsius Mining LLC (1387); Celsius Network Inc. (1219); Celsius Network Limited (8554); Celsius Networks Lending LLC (3390); and Celsius US Holding LLC (7956). The location of Debtor Celsius Network LLC's principal place of business and the Debtors' service address in these chapter 11 cases is 121 River Street, PH05, Hoboken, New Jersey 07030.

objects to the same. Víctor Ubierna de las Heras requests that the Court deny the Debtors' motion. Specifically for its joinder and objection, Víctor Ubierna de las Heras states the following:

1. On September 30, 2022, the United States Trustee filed a LIMITED OMNIBUS OBJECTION to the Motion. (Dkt. 933.) In the objection, the US Trustee correctly notes that *"at this juncture, there are too many questions regarding the Debtors' cryptocurrency holdings to approve any withdrawals or sales. Those questions arise both from the Debtors' lack of transparency evidenced in the Examiner Motion and the Debtors' failure to file schedules and statements of financial affairs. Moreover, the Examiner has been duly appointed to answer many of these exact questions. The Examiner's Report is forthcoming as provided for by the Examiner Order, and any proposed distribution or sale should take into account the findings of the Examiner and the Examiner's Report. Accordingly, the US Trustee specify that the Motion should be denied until the Examiner's Report is submitted"*. Hereby, Víctor Ubierna de las Heras, pro se Creditor respectfully joins the objection and its reasoning and request that the motion be denied, at least until the examiner's report.

2. To this moment, three states have filed replies to the motion, Texas, Vermont, and Wisconsin (Docket number 922, 925 and 967 respectively). In this response and objection Víctor Ubierna de las Heras joins the three of them in their

worries about Debtors motion compliance with State law and requests that the motion be denied.

Dated October 5, 2022

/s/ Víctor Ubierna de las
Heras

VICTOR UBIERNA DE LAS
HERAS

Pro se Creditor